

1 ARIEL STERN, ESQ.  
Nevada Bar No. 8276  
2 PAIGE L. MAGASTER, ESQ.  
Nevada Bar No. 15557  
3 AKERMAN LLP  
1180 N. Town Center Dr., Suite 290  
4 Las Vegas, Nevada 89134  
Telephone: (702) 634-5000  
5 Facsimile: (702) 380-8572  
Email: ariel.stern@akerman.com  
6 Email: paige.magaster@akerman.com

7 *Attorneys for NewRez LLC f/k/a New Penn*  
8 *Financial d/b/a Shellpoint Mortgage Servicing*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 NEWREZ LLC f/k/a NEW PENN FINANCIAL  
d/b/a SHELLPOINT MORTGAGE  
12 SERVICING,

13 Counter-claimant,

14 v.

15 TEAL PETALS ST TRUST; DOES I through X,  
inclusive; and ROE CORPORATIONS  
16 I through X, inclusive,

17 Counter-defendants.

18 NEWREZ LLC f/k/a NEW PENN FINANCIAL  
d/b/a SHELLPOINT MORTGAGE  
19 SERVICING,

20 Plaintiff,

21 v.

22 IYAD HADDAD aka EDDIE HADDAD;  
RESOURCES GROUP, LLC; RESOURCES  
23 GROUP, LLC as Trustee of TEAL PETALS ST  
TRUST; 9863 DUBLIN VALLEY, LLC;  
24 SATICOY BAY LLC dba SATICOY BAY LLC  
SERIES 9863 DUBLIN VALLEY ST;  
25 SATICOY BAY LLC SERIES 9863 DUBLIN  
VALLEY ST; DOES I through X, inclusive; and  
26 ROE CORPORATIONS I through X, inclusive,

27 Defendants.  
28

Case No.: 2:22-cv-00395-JAD-DJA  
Consolidated with  
Case No.: 2:23-cv-01839-JAD-MDC

**STIPULATION AND ORDER TO EXTEND  
DISCOVERY DEADLINES**

**(EIGHTH REQUEST)**

NewRez LLC f/k/a New Penn Financial d/b/a Shellpoint Mortgage Servicing (**Shellpoint**) and Teal Petals St Trust; Resources Group, LLC; Resources Group, LLC as Trustee of Teal Petals St Trust; 9863 Dublin Valley, LLC; Iyad Haddad aka Eddie Haddad; Saticoy Bay LLC dba Saticoy Bay LLC Series 9863 Dublin Valley St; and Saticoy Bay LLC Series 9863 Dublin Valley St (collectively, **Defending Parties** and together with Shellpoint, the **Parties**) file this stipulation to request the court to extend the close of discovery by one hundred and twenty (120) days. This is the Parties' eighth request to extend the discovery deadline in the lead case and third request in the Consolidated **Introduction**.

The Court consolidated two cases pending in the United States District Court for the District of Nevada: Case No. 2:22-cv-00395 (**2022 Action**) and Case No. 2:23-cv-01839 (**2023 Action**). ECF No. 69. The Court is familiar with the facts and procedural history in these matters, as set forth in its order granting Shellpoint's motion for judgment on the pleadings and Shellpoint's quiet-title counterclaim in the 2022 Action, ECF No. 62, and the order it issued in the 2023 Action on the defendants' motions to dismiss, ECF No. 45 in the 2023 Action. The procedural history, including the claims and counterclaims Shellpoint asserts against the Defending Parties on which discovery shall proceed, is set forth in the Parties' stipulations to consolidate filed in both actions. ECF No. 68; *see also* ECF No. 54 in the 2023 Action.

## **II. STATEMENT SPECIFYING THE DISCOVERY COMPLETED.**

Discovery is currently set to close on **April 21, 2025**. ECF No. 82.

### **A. 2022 ACTION**

To date, the Parties have undertaken the following discovery in the 2022 Action:

- 1) Shellpoint served its initial disclosures on April 7, 2022.
- 2) Teal Petals served its initial disclosures on August 9, 2023.
- 3) Teal Petals served its first set of interrogatories and first set of requests for production of documents on Shellpoint on October 17, 2023.
- 4) Shellpoint served a first supplement to its initial disclosures on October 25, 2023.
- 5) Shellpoint served its first set of interrogatories, first set of requests for admission, and first set of requests for production of documents on Teal Petals on October 25, 2023.

6) Shellpoint served a subpoena duces tecum for real property tax records on the custodian of records for the Clark County Treasurer on October 26, 2023.

7) Shellpoint served a second supplement to its initial disclosures on November 3, 2023.

8) Shellpoint served a notice of deposition on November 3, 2023, setting Teal Petals' Rule 30(b)(6) deposition for November 29, 2023.

9) Shellpoint received documents from the Clark County Treasurer in response to its subpoena duces tecum on November 6, 2023.

10) Shellpoint served a third supplement to its initial disclosures on November 29, 2023.

11) Shellpoint served its answers to Teal Petals' first set of interrogatories and first set of requests for production of documents on November 29, 2023.

12) Teal Petals' served its responses to Shellpoint's first set of interrogatories, first set of requests for admission, and first set of requests for production of documents on November 29, 2023.

13) Shellpoint served its verified answers to Teal Petals' first set of interrogatories on December 11, 2023.

14) Shellpoint served a first amended notice of deposition on December 29, 2023, setting Teal Petals' Rule 30(b)(6) deposition for January 17, 2024, to continue as necessary the next day.

15) Shellpoint served a second amended notice of deposition on January 16, 2024, setting Teal Petals' Rule 30(b)(6) deposition for February 12, 2024.

16) Shellpoint served a third amended notice of deposition on February 9, 2024, setting Teal Petals' Rule 30(b)(6) deposition for March 26, 2024.

17) Shellpoint vacated the Rule 30(b)(6) deposition of Teal Petals on March 25, 2024.

18) Teal Petals served a first supplement to its initial disclosures on May 6, 2024.

## **B. 2023 ACTION**

Prior to consolidation, the Parties undertook the following discovery in the 2023 Action:

1) Resources Group, LLC; Resources Group, LLC as Trustee of Teal Petals St Trust; and 9863 Dublin Valley, LLC served their initial disclosures on March 1, 2024.

2) Shellpoint served its initial disclosures on March 6, 2024.

3) Shellpoint served a first supplement to its initial disclosures on April 12, 2024.

4) Saticoy Bay LLC; Saticoy Bay LLC Series 9863 Dublin Valley St; and Iyad Haddad<sup>1</sup> served their initial disclosures on April 25, 2024.

5) Resources Group, LLC; Resources Group, LLC as Trustee of Teal Petals St Trust; and 9863 Dublin Valley, LLC served their first supplemental disclosures on May 6, 2024.

6) Shellpoint served its first set of written discovery to Defendants in July 2024. Specifically, Shellpoint served its first set of requests for production of documents on July 5, 2024; its first set of interrogatories on July 22, 2024; and its first set of requests for admission on July 25, 2024.

7) Shellpoint served a second supplement to its initial disclosures on July 31, 2024.

8) Shellpoint served a subpoena duces tecum to Kristi Hewes on August 5, 2024.

9) Resources Group, LLC; Resources Group, LLC as Trustee of Teal Petals St Trust; and 9863 Dublin Valley, LLC served their responses to Shellpoint's first set of requests for production of documents on August 5, 2024.

10) Kristi Hewes responded to Shellpoint's subpoena duces tecum on August 22, 2024.

11) Saticoy Bay LLC Series 9863 Dublin Valley St; Saticoy Bay LLC dba Saticoy Bay LLC Series 9863 Dublin Valley St; and Iyad Haddad aka Eddie Haddad served their responses to Shellpoint's first set of requests for production of documents on August 23, 2024.

12) Resources Group, LLC; Resources Group, LLC as Trustee of Teal Petals St Trust, 9863 Dublin Valley, LLC; Saticoy Bay LLC Series 9863 Dublin Valley St; Iyad Haddad aka Eddie Haddad; and Saticoy Bay LLC dba Saticoy Bay LLC Series 9863 Dublin Valley St served their responses to Shellpoint's first set of requests for admissions on September 3, 2024.

13) 9863 Dublin Valley, LLC served their first set of requests for production of documents and interrogatories on September 28, 2024.

14) Iyad Haddad aka Eddie Haddad served his request for production of documents to Shellpoint on October 30, 2024.

---

<sup>1</sup> Resources Group, LLC; Resources Group, LLC as Trustee of Teal Petals St Trust; 9863 Dublin Valley, LLC Saticoy Bay LLC; Saticoy Bay LLC Series 9863 Dublin Valley St and Iyad Haddad are all defendants in the 2023 Action. They are referred to here, collectively, as "**Defendants**," rather than "Defending Parties," which includes Teal Petals St Trust, a plaintiff and counterdefendant in the 2022 Action.

15) Shellpoint served its responses to Iyad Haddad aka Eddie Haddad's requests for production of documents on December 2, 2024.

16) Shellpoint served its responses to 9863 Dublin Valley, LLC's interrogatories on December 5, 2024.

17) Shellpoint served its responses to 9863 Dublin Valley, LLC's requests for production of documents on December 11, 2024.

18) 9863 Dublin Valley, LLC served its amended responses to Shellpoint's first set of requests for admissions on December 17, 2024.

19) Resources Group, LLC served its amended responses to Shellpoint's requests for admissions on December 17, 2024.

20) 9863 Dublin Valley, LLC served its amended responses to Shellpoint's first set of requests for production of documents and amended responses to Shellpoint's first set of interrogatories on December 20, 2024.

21) Resources Group, LLC as Trustee of Teal Petals St Trust served their responses to Shellpoint's first set of interrogatories and amended responses to Shellpoint's first set of requests for production of documents on December 20, 2024.

22) Resources Group, LLC served its responses to Shellpoint's first set of interrogatories and amended responses to Shellpoint's requests for production of documents on December 20, 2024.

23) Iyad Haddad aka Eddie Haddad served his responses to Shellpoint's first set of requests for admissions and interrogatories on December 23, 2024.

24) Iyad Haddad aka Eddie Haddad served his amended responses to Shellpoint's first set of requests for production of documents on January 27, 2025.

### **III. SPECIFIC DESCRIPTION OF THE DISCOVERY THAT HAS NOT BEEN COMPLETED.**

1) Shellpoint maintains that Defendants have not provided complete responses to Shellpoint's first set of requests for production of documents, first set of requests for admission, and first set of interrogatories.

2) Depositions of the Defending Parties, including pursuant to Rule 30(b)(6).

3) Further discovery on issues that arise in the course of discovery.

4) Expert disclosures and depositions.

5) Third-party discovery.<sup>2</sup>

**IV. REASON WHY EXTENSION IS REQUIRED / GOOD CAUSE.**

Prior to consolidation, Shellpoint and Teal Petals St Trust agreed to reset the discovery schedule in the 2022 Action to align with the discovery schedule in the 2023 Action, which the Court approved. ECF No. 61. The Parties subsequently agreed that the discovery schedule in the 2023 Action shall govern following consolidation, noting in the consolidation stipulation their intent to separately submit a stipulation and order to that effect. ECF No. 68 at ¶ 11. The parties litigated discovery motions concerning Defendants' responses to Shellpoint's paper discovery, after which Defendants' supplemented their responses and disclosures. Shellpoint and Defendants dispute whether the supplementation complies with the magistrate judge's order, ECF No. 125, and expect further motion practice concerning this dispute, requiring additional time in discovery.

For the reasons set forth above and in order to permit the completion of discovery, the Parties seek an extension of the close of discovery to August 19, 2025, which is 120 days after the current April 21, 2025 discovery deadline. Additionally, an extension is warranted based on the disassociations of Natalie L. Winslow and Christopher Benner. ECF No. 126, 133.

**V. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY.**

The Parties therefore agree that the current discovery deadline should be extended one hundred and twenty (120) days, with the following deadlines:

- (a) Discovery Cut Off: **Tuesday, August 19, 2025.**
- (b) Motions to amend pleadings or add parties: **None requested.**
- (c) Initial Expert Disclosures: **Friday, June 20, 2025.**
- (d) Rebuttal Expert Disclosures: **Tuesday, July 22, 2025.**
- (e) Dispositive motions: **Friday, October 3, 2025.**
- (f) Pre-Trial Order: **Monday, October 20, 2025.**<sup>3</sup>

<sup>2</sup> The Parties reserve the right to participate in additional discovery, including but not limited to an inspection of the subject property.

<sup>3</sup> Sixty days after to the close of discovery is Saturday October 18, 2025. The Parties agree to move the deadline to the next business day.

DATED this 30th day of January, 2025.

<p><b>AKERMAN LLP</b></p> <p><u>/s/ Paige L. Magaster</u>  ARIEL STERN, ESQ.  Nevada Bar No. 8276  PAIGE L. MAGASTER, ESQ.  Nevada Bar No. 15557  1180 North Town Center Drive, Suite 290  Las Vegas, NV 89144</p> <p><i>Attorneys for NewRez LLC f/k/a New Penn Financial d/b/a Shellpoint Mortgage Servicing</i></p>	<p><b>LAW OFFICES OF ROGER P. CROTEAU</b></p> <p><u>/s/ Timothy E. Rhoda</u>  ROGER P. CROTEAU, ESQ.  Nevada Bar No. 4958  TIMOTHY E RHODA, ESQ.  Nevada Bar No. 7878  2810 W. Charleston Boulevard, Suite 67  Las Vegas, NV 89102</p> <p><i>Attorneys for Teal Petals St Trust; Resources Group, LLC; Resources Group, LLC in its capacity as Trustee of Teal Petals St Trust; 9863 Dublin Valley, LLC</i></p>
<p><b>LAW OFFICES OF MICHAEL F. BOHN, ESQ.</b></p> <p><u>/s/ Michael F. Bohn</u>  MICHAEL F. BOHN, ESQ.  Nevada Bar No. 1641  2260 Corporate Circle, Suite 480  Henderson, NV 89074</p> <p><i>Attorney for Defendants Saticoy Bay, LLC dba Saticoy Bay LLC Series 9863 Dublin Valley St.; Saticoy Bay LLC Series 9863 Dublin Valley St.; and Iyad Haddad</i></p>	

**IT IS SO ORDERED.**



**UNITED STATES MAGISTRATE JUDGE**

Case No.: 2:22-cv-00395-JAD-DJA

Consolidated with

Case No.: 2:23-cv-01839-JAD-MDC

DATED: 1/31/2025

akerman